

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DEFENDANT'S ASSENTED-TO MOTION FOR LEAVE TO FILE  
SENTENCING MEMORANDUM LATE AND  
JOINT MOTION TO CONTINUE SENTENCING

Defendant, Michael Crooker, respectfully requests leave to file his sentencing memorandum this day, April 16, 2007, one week later than the date previously established by the Court. Should the Court allow this Motion, the parties jointly request that the Court briefly continue the sentencing hearing to allow the government ample time to respond. As reasons for this motion, defendant through undersigned counsel states that on April 6, 2007, he requested one additional business day to file the memorandum because of illness. That illness lingered through April 11 and counsel did not fully return to work until Thursday, April 12. Counsel completed the memorandum that day but delayed filing the memorandum pending assent from the government. Last Thursday, counsel e-mailed the memorandum to the government in an effort to determine whether the government would need additional time to respond.

Undersigned counsel and AUSA Kevin O'Regan have since conferred concerning the projected course of defendant's sentencing. After review of defendant's sentencing memorandum and consideration of government counsel's trial schedule in

unrelated matters, the government requests until May 11, 2007 to file a response to the memorandum. Defendant assents to this request. Should the Court allow defendant to file his sentencing memorandum this day and allow the government to file its response by May 11, 2007, the parties jointly request that the sentencing hearing be continued to a date convenient to the Court during the latter part of the week of May 21, 2007.<sup>1</sup>

The government assents to this Motion provided it is allowed the additional time requested to respond.

MICHAEL ALAN CROOKER  
By his attorney,

/s/ Timothy G. Watkins  
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CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), as well as to United States Probation Officer Richard Rinaldi by electronic mail, on April 16, 2007.

/s/ Timothy G. Watkins

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<sup>1</sup>Undersigned counsel is scheduled for trial before Judge Gertner beginning May 14, 2007 in United States v. John Handy, Criminal No. 04-10361-NG. Counsel expect that matter to be concluded by May 22, 2007.